

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

C. PEPPER LOGISTICS, LLC, et al.,	)	
	)	
Plaintiffs,	)	
	)	Case No.: 4:20-cv-01444
v.	)	
	)	
LANTER DELIVERY SYSTEMS, LLC, et	)	
al.,	)	
	)	
Defendants.	)	

**DECLARATION OF RACHEL TOMASEK PURSUANT TO  
28 U.S.C. § 1746**

I, Rachel Tomasek, declare as follows under 28 U.S.C § 1746:

1. I am the age of majority, and I am competent to make this declaration.
2. I make this declaration based on my personal knowledge and observations.
3. I began working for Logistic Resources Solutions, Inc. ("LRS"), in or around February of 2019.
4. LRS was, and to my knowledge is, an Illinois corporation.
5. I performed all of my job responsibilities for LRS out of my home in Elburn, Illinois.
6. When I began working for LRS I was trained in Madison, Illinois.
7. I never traveled to Missouri to perform any work for LRS.
8. The last date I worked for LRS was August 22, 2020. My employment with LRS ended that day.
9. Prior to the end of my employment with LRS, I never communicated with Lanter Delivery Systems, LLC, White Line Systems, LLC, or Darien Brokerage, LLC employees or representatives concerning any orchestration of activities that would lead to the cessation of LRS's – or any C. Pepper Logistics, LLC affiliate's – business operations.
10. I had no role in the alleged conspiracy or plot described in the Petition of the above-captioned case.

11. Specifically, prior to the end of my employment with LRS, I arranged for the payment of all bills, including those relating to any rental equipment, as I had done throughout my employment.
12. Moreover, just before the end of my employment, I provided LRS management with a stack of bills ready for payment that I prepared the week before.
13. I did not take any confidential or proprietary information from LRS or its affiliates upon my termination of employment with LRS.
14. I did not provide any confidential or proprietary information of LRS or its affiliates to any other business.
15. I do not currently reside in Missouri and have never resided in Missouri.
16. I do not own, lease, or possess property – real or personal – that is located in Missouri.
17. I do not have a bank account in Missouri.
18. I have not availed myself to the state or Federal courts of Missouri.
19. I have never had any ownership interest in any business based in Missouri.
20. LRS failed to pay me wages for the work I performed from August 10, 2020, through August 22, 2020. Further, LRS did not pay me my accrued, unused sick or vacation time after my employment ended.
21. I did not travel to Texas in July 2020; I did not attend a meeting with Lonnie White in July of 2020; I have never been to the state of Texas.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

12/22/2020

Executed on \_\_\_\_\_

DocuSigned by:

*Rachel Tomasek*  
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\_\_\_\_\_  
Rachel Tomasek